UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

JASON MATTHEWS,

Plaintiff,

v.

Case No. 1:20-cv-00733-JTN-RSK

Hon. Janet T. Neff

ADR BILLING LLC,
EPPSSA LLC,
DRS PROCESSING LLC,
KNOX BROTHERS HOMES LLC,
DARRON RAY TAYLOR,
EBONY TERRELL MINTER,
BERNARD N. WESCOTT,
DARRYL TYRONE MILLER, and
CHEREKA LYNETTE TINSLEY,

Defendants.

Phillip C. Rogers (P34356) Attorney for Plaintiff 6140 28th Street SE, Suite 115 Grand Rapids, Michigan 49546-6938 (616) 776-1176 ConsumerLawyer@aol.com DOBBS & NEIDLE, P.C.

Gregory R. Neidle (P59273) Attorneys for Defendants ADR Billing, LLC and Darron Ray Taylor, only 30150 Telegraph Road

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DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Defendants, ADR Billing, LLC, and Darron Ray Taylor, ("Defendants"), by their attorneys, DOBBS & NEIDLE, P.C, hereby move this Court for an extension of time to respond to the Plaintiff's Complaint filed in this matter. In support of their Motion, Defendants state:

- 1. On 08/05/2020, Plaintiff filed his initial Complaint in this matter. (ECF No. 1).
- On 08/26/2020, Gregory R. Neidle filed his Appearance on behalf of Defendants, ADR Billing, LLC, and Darron Ray Taylor.

- 3. On 08/13/2020, a returned summons for these Defendants was filed, with an answer due date of 08/31/2020. (ECF Nos. 6, 7)
- 4. On August 26, 2020, Defendants' counsel requested an extension to the answer due date to September 4, 2020.
- 5. Pursuant to W.D. Mich. LR 7.1(d) Defendants state that in an email exchange on August 26, 2020 with Plaintiff's counsel, Defendants' counsel explained the nature of this Motion and asked for concurrence for the requested relief. Plaintiff's counsel stated he would not oppose the relief requested.

WHEREFORE, Defendants respectfully request that this Court grant their Motion, and extend the time for Defendants to answer, move or otherwise respond to the Complaint up to September 4, 2020, and any other relief this Court deems just and equitable.

Respectfully submitted,

DOBBS & NEIDLE, P.C.

Date: August 26, 2020 /s/ Gregory R. Neidle

DOBBS & NEIDLE, PC

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MI Bar Number P59273

Attorneys for Defendants ADR Billing, LLC and

Darron Ray Taylor, only

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2020, I electronically filed a copy of the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Phillip C. Rogers

and I hereby certify that I have mailed by United States Postal Service the documents to the following non ECF participants:

N/A

Dated: August 26, 2020

/s/ Gregory R. Neidle DOBBS & NEIDLE, PC 30150 Telegraph Road Suite 410

Bingham Farms, MI 48025 Phone: (248) 723-9511

Email: gneidle@dobbsneidle.com

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